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ABSTRACT

Presented is a condensed evaluation report from the National Advisory Council on the Education of Disadvantaged Children relating to 1970-71 school year programs funded under the Elementary and Secondary Education Act, Title I. The major foci of the Title I report are parent involvement and accountability, school finance, state discretion and delivery of services, quality compensatory and integrated education, and cultural differences. The last chapter is a summary with recommendations relating to each major area within the scope of the report. The document contains 5 appendices, one of which is a comparative study chart of Title I evaluations completed since 1969. (AL)

BESE/Title I

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THE 1971 ANNUAL REPORT TO THE PRESIDENT AND THE CONGRESS

---TITLE I, E.S.E.A.---

The Weakest Link:

The Children of the Poor

*****

NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN
1717 H Street, NW., Washington, D.C. 20006

RC005314

Public Law 91-230
91st Congress, H. R. 514
April 13, 1970

An Act

To extend programs of assistance for elementary and secondary education, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

Elementary and secondary education assistance programs, extension.

78 Stat. 252.

POLICY WITH RESPECT TO THE APPLICATION OF CERTAIN PROVISIONS OF FEDERAL LAW

SEC. 2. (a) It is the policy of the United States that guidelines and criteria established pursuant to title VI of the Civil Rights Act of 1964 and section 182 of the Elementary and Secondary Education Amendments of 1966 dealing with conditions of segregation by race, whether de jure or de facto, in the schools of the local educational agencies of any State shall be applied uniformly in all regions of the United States whatever the origin or cause of such segregation.

(b) Such uniformity refers to one policy applied uniformly to de jure segregation wherever found and such other policy as may be provided pursuant to law applied uniformly to de facto segregation wherever found.

(c) Nothing in this section shall be construed to diminish the obligation of responsible officials to enforce or comply with such guidelines and criteria in order to eliminate discrimination in federally-assisted programs and activities as required by title VI of the Civil Rights Act of 1964.

(d) It is the sense of the Congress that the Department of Justice and the Department of Health, Education, and Welfare should request such additional funds as may be necessary to apply the policy set forth in this section throughout the United States.

TITLE I—AMENDMENTS TO THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965

PART A—AMENDMENTS TO TITLE I OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965 (EDUCATION OF DISADVANTAGED CHILDREN)

EXTENSION OF TITLE I OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965

SEC. 101. (a) Section 102 of title I of the Elementary and Secondary Education Act of 1965 is amended by striking out "June 30, 1970" and inserting in lieu thereof "June 30, 1973".

(b) The third sentence of section 103(a)(1)(A) of such title I is amended by striking out "the fiscal year ending June 30, 1969," and inserting in lieu thereof "each of the succeeding fiscal years ending prior to July 1, 1972,".

(c) Section 121(d) of such title I is amended by striking out "each" where it appears after "$50,000,000" and by striking out "the succeeding fiscal year" and inserting in lieu thereof "for each of the succeeding fiscal years ending prior to July 1, 1973".

STUDY OF ALLOCATION OF FUNDS

SEC. 102. (a) The Commissioner of Education shall make a study of the allocation of sums appropriated for the purposes of title I of the Elementary and Secondary Education Act of 1965 and of the effectiveness of the various provisions of such title in making funds

84 STAT. 121
84 STAT. 122

79 Stat. 27; 81 Stat. 787. 20 USC 241a note.

48-488 O - 70

NATIONAL ADVISORY COUNCIL

SEC. 112. Section 134 of title I of the Elementary and Secondary Education Act of 1965 is amended to read as follows:

79 Stat. 34. 20 USC 2411.

"NATIONAL ADVISORY COUNCIL

"SEC. 134. (a) There shall be a National Advisory Council on the Education of Disadvantaged Children (hereinafter in this section referred to as the 'National Council') consisting of fifteen members appointed by the President, without regard to the provisions of title 5, United States Code, governing appointment in the competitive service, for terms of three years, except that (1) in the case of initial members, five shall be appointed for terms of one year each and five shall be appointed for terms of two years each, and (2) appointments to fill vacancies shall be only for such terms as remain unexpired. The National Council shall meet at the call of the Chairman.

80 Stat. 378. 5 USC 101 et seq.

"(b) The National Council shall review and evaluate the administration and operation of this title, including its effectiveness in improving the educational attainment of educationally deprived children, including the effectiveness of programs to meet their occupational and career needs, and make recommendations for the improvement of this title and its administration and operation. These recommendations shall take into consideration experience gained under this and other Federal educational programs for disadvantaged children and, to the extent appropriate, experience gained under other public and private educational programs for disadvantaged children.

Review and evaluation.

"(c) The National Council shall make such reports of its activities, findings, and recommendations (including recommendations for changes in the provisions of this title) as it may deem appropriate and shall make an annual report to the President and the Congress not later than March 31 of each calendar year. Such annual report shall include a report specifically on which of the various compensatory education programs funded in whole or in part under the provisions of this title, and of other public and private educational programs for educationally deprived children, hold the highest promise for raising the educational attainment of these educationally deprived children. The President is requested to transmit to the Congress such comments and recommendations as he may have with respect to such report."

Annual report to President and Congress.

NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN

WASHINGTON, D.C.

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James Branscome
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Nelson Gross
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Louis Rodriguez
Ralph Tyler
Sheldon White

Herman R. Goldberg,
Chairman

March 1, 1971

Dear Sirs:

I am pleased to submit to you the 1971 Annual Report of the National Advisory Council on the Education of Disadvantaged Children. From their appointment on March 3, 1970, every major concern facing the Council members was ultimately decided by their repeating to themselves the simple question, "What is best for the children?" The Council maintained its perspective throughout the year of deliberation by repeatedly returning to its central concern, "What is best for the children?"

Anticipating the abundance of evaluative studies devoted to Title I, ESEA during its 5th anniversary year, the Council decided against instituting more of the same research. Instead, the Council concentrated on three elements affecting the success of Title I – delivery of services, parent involvement, and cultural diversity. The relationship of compensatory education and the rapidly moving dynamic of school desegregation was also an important concern the Council faced.

In addition to its dedication and energy, the very composition of the Council was most beneficial to this year's undertakings. The Council was itself "culturally diverse," with a broad range of levels and types of educational experience, an age-span of three generations, and wide geographic distribution. The resultant disparity of viewpoints enhanced the Council's performance in its role as evaluator of administrative practice and the sociological insight behind that practice.

Robert L. Ridgley, member of the Board of Education, Portland, Oreg., chaired the Subcommittee on Delivery of Services during its investigation of the crucial problem of cooperation between State and Federal levels of government in successfully administering Title I programs. Alfred Z. McElroy, board member of the Independent School District of Port Arthur, Tex., led the Subcommittee on Parent Involvement during its active contribution to the preparation of new U.S. Office of Education guidelines strengthening parent advisory councils. James Branscome, Youth Director of the Appalachian Regional Commission, Washington, D.C., headed the Subcommittee on Cultural Diversity in its discussions of the urgent necessity for compensatory education programs to incorporate the special needs of culturally different children in program planning and execution.

The Council acknowledges with appreciation the participation in its discussions of a number of concerned representatives from both official and voluntary organizations including Hon. William H. Ayers, former Congressman from Ohio; Theodore Tetzlaff, formerly with the office of Hon. John Brademas, Congressman from Indiana; Charles Ratcliffe, Minority Counsel, House Education and Labor Committee; Jack Reid, Majority Counsel, House Education and Labor Committee; Ruby Martin, Washington Research Project; William Denton, Coordinator of Title I Research, Council of the Great City Schools; Phyllis McClure, NAACP Legal Defense Fund; and Mark Yudof, Staff Attorney, Center for Law and Education, Harvard University.

For their cooperation in providing needed information, the Council extends its gratitude to U.S. Department of Health, Education, and Welfare and Office of Education Personnel, including Timothy E. Wirth, former Deputy Assistant Secretary for Intradepartmental Education Affairs; Richard L. Fairley, Director,

Division of Compensatory Education; Cornelius Butler, Acting Chief, Program Support Branch; Barbara Desind, Program Officer; Glen Kamber, Education Program Specialist; Hilda Maness Lynch, former Education Program Specialist; and Dr. Gilbert Austin, Special Assistant to the Director of Evaluation, Office of the Secretary, Department of Health, Education, and Welfare. In addition, the Council wishes to thank Helen Weinman, House Education and Labor Committee, for her assistance. The Council also wishes to thank the staff of International Joint Commission- United States and Canada, for their gracious hospitality throughout the year in permitting us the use of their conference room facilities at 1717 H. St., NW., Washington, D.C. and for sharing equipment with the Council during peak periods of production.

The Council further recognizes the special contribution of two experienced educators who served as consultants- Mr. Isadore Pivnick, Assistant Superintendent for Innovative Planning, San Francisco Unified School District, San Francisco, Calif., and Dr. Louis J. Rubin, Dean, Nova University, Fort Lauderdale, Fla.

The Council, and especially the Chairman, acknowledges the highly competent and creative work of the NACEDC staff- Roberta Lovenheim, Research Assistant; Lois W. Paul, Research Secretary; and Annie M. Phillips, Secretary.

Any enterprise as vast and as comprehensive as America's compensatory education programs for disadvantaged children requires the full understanding and cooperation of those who would improve its effectiveness. In expanding their awareness of the functioning of Title I programs and what they can to to support them, it is the Council's hope that the President and Congress will follow the Council's advice to itself – to maintain as the fulcrum of their deliberations and decisions the question, "What is best for the children?"

Respectfully submitted,

Herman R. Goldberg

Herman R. Goldberg
Chairman

The President
The White House

Honorable Spiro T. Agnew
President of the Senate

Honorable Carl B. Albert
Speaker of the House of Representatives

Enclosure

PREFACE: NACEDC Comments on the House Committee on Government Operations Report on Presidential Councils and Commissions

Before presenting our evaluation of the effectiveness of Title I of the Elementary and Secondary Education Act, the Council in the spirit of facing itself, feels it appropriate to call attention to a recent study on Presidential advisory bodies. Since there is no National Advisory Council on National Advisory Councils, we wish to comment on the *Forty-third Report by the Committee on Government Operations: The Role and Effectiveness of Federal Advisory Committeees,* presented to the House of Representatives, December 11, 1970.

From the experience of the National Advisory Council on the Education of Disadvantaged Children, we endorse the following recommendations made by the House Committee on Government Operations regarding the organization and management of Presidential Councils:

1. The Office of Management and Budget should be strengthened to include a Committee Management Secretariat.

2. Departments and agencies should establish fixed procedures and responsibilities for committee management and reporting at the highest organizational level, such as the Office of the Secretary, Undersecretary or Assistant Secretary, or the Office of the Director.

3. Wherever possible, an advisory body should be established as an independent entity, but subject to management guidelines. Presidential committees should be funded either independently by the Congress or from the President's contingency fund, but *not* from funds previously designated by the Congress for agency operations.

4. The charter of an advisory body should not be ill-defined. It should be clearly stated and within the competence of the committee. Vague mandates are costly and inefficient.

5. Congress should provide advisory groups with the funds to publish their work when it involves public studies and reports.

6. The mechanism to provide a balanced representation and to maintain continuity through rotation of terms of office should be achieved through law and guidelines.

7. A permanent depository within the Congressional Reference Service of the Library of Congress should be created where the public reports of advisory groups would be available. All commissions and committees should be required to forward such materials to the Library of Congress.

An advisory body can be useful to the three divisions of Government with which it works - the agency it examines, the President it serves, and the Congress to which it reports. These and other recommendations made by the House Committee on Government Operations seem, in the Council's opinion, to be precisely what advisory bodies need to function more efficiently.

CONTENTS

		Page
Letter of Transmittal		iii
Preface	NACEDC Comments on the House Committee on Government Operations Report on Presidential Councils and Commissions	v
Introduction		1
Chapter I	Parent Involvement and Accountability in Title I: Promise and Performance	5
Chapter II	Title I and School Finance	7
Chapter III	State Discretion and Delivery of Services: An Admnistrative and Management Review of Title I	11
Chapter IV	Quality Compensatory Education and Quality Integrated Education: A Report of a Three-Year Longitudinal Study (Fifteen Point Program) in the City School District of Rochester, N.Y., 1967-70	15
Chapter V	Cultural Difference in the "Melting Pot" Society	19
Chapter VI	Summary and Recommendations: What We Can Do Now	23
Appendixes		
A.	Presidential State-Federal Title I Internship Proposal	29
B.	NACEDC Extended Remarks on Parent Involvement, October 1970	31
C.	Cost Analysis of Three-Year Longitudinal Study (Fifteen Point Program), Rochester, N.Y., 1967-1970	35
D.	Comparative Study Chart, Title I Evaluations Completed Since January 1969	39
E.	Recapitulation of Recommendations of Previous Council	45

INTRODUCTION.

The atmosphere of hope and expectation which surrounded the birth of Title I of the Elementary and Secondary Education Act (ESEA) is now becoming one of wider frustration, and even sporadic despair. Through our democratic process, the fate of those trapped by economic, and consequently educational, deprivation is placed squarely in the hands of an increasingly spending-conscious voting public. Simultaneously the public asks for more programs designed to bail our 17 million children out of their "disadvantaged" situation, and expresses concern over its shrinking purse. These mutually exclusive concerns compound the difficulty in getting the funds necessary to support compensatory education and then to deliver them effectively where they are needed most.

In evaluating the educational attainment of disadvantaged children as a result of Title I assistance, the National Advisory Council has not lost sight of the dependent relationship between extensive compensatory education and the current financial crisis. Specifically, the Council has asked "How have these financial pressures at all levels of Government and among the American public affected the delivery of educational services to poor children?"

Title I has become another exercise in despair. From the depths of near bankruptcy, local school districts working with State and local funds view this $1.5 billion Federal program with ambivalence.

School costs are rising geometrically, with the largest increases being for teacher salaries and reducing class size, while voters visibly challenge efforts to raise taxes or approve bond issues.

Educational services cannot improve under these choking financial conditions. Several urban boards of education, mayors, and city managers have stated that they do not expect in 1971 to be able to continue school programs as their constituencies have known them. Although some feel that they will squeak by for the remainder of the current school year, they do not expect to continue basic, let along present, supportive services.

There are other voices of despair. An American Indian usually earns no more than $1,500 each year - that is 75 percent *below* the national average. Even today the same Indian can expect to survive for only 44 years.

Although we have had some special bilingual programs, there are still 10 million Americans whose primary language is Spanish and who are frequently forbidden to speak their native tongue in school.

In the opinion of their teachers, approximately one-sixth of the children receiving Title I assistance in grades 1-6 will *not* complete high school. Forty percent of all children of migrant families who are eligible for Title I aid will *not* complete high school. The Appalachian dropout rate is 25-30 percent higher than the national level of 30 percent. The average educational level for all Indians under Federal supervision is 5 school years, and more than one-fifth of all Indian men have less than 5 years of schooling.

Underscoring the full cyclical relationship between education and economic success, 40 percent of Title I elementary pupils in 1968-69 came from families where the head of the household had not completed high school. (In order to be eligible for Title I assistance, the children must be from families earning less than $2,000-3,000 per year.)

The ethnic spectrum of Title I children considered to be potential dropouts by their teachers was 53 percent Negro, 35 percent white, and 10 percent Spanish-surnamed.

The polarity is clear: Cyclical poverty for the ethnic minorities and Appalachian poor contrasted with economic conservatism among taxpayers. Uncertainty in the funding of needed compesnatory education is a political frustration for both groups, and genuine despair is the outcome.

A study on Title I completed by a regional laboratory administered by the U.S. Office of Education reveals that 54 percent of teachers surveyed had not received any special training in teaching the academically disadvantaged. Federal directives have required local school districts to *concentrate* their funds on those Title I eligible pupils having the greatest need. This leaves two-thirds of Title I eligible students unserved and many more poor children, whose parents gross more than $2,000-3,000 annually, ineligible.

School administrators face uncertainty each year as the Congress and the President determine slowly and heatedly the DHEW-Labor Budget. Yet the same administrators face the criticism each year that they did not adequately plan their Title I programs.

Dissemination of evaluation reports on Title I is inadequate, leaving the planning of compensatory education programs months, even years, behind available data and trends. There is questionable value gained from these evaluation projects since the feedback mechanism is sorely inefficient.

It is, therefore, valid to ask "Have we really had compensatory education as a national experience for 5 years?"

In his first speech following his appointment as U.S. Commissioner of Education, Dr. Sidney P. Marland, Jr., launched an attack against "the abomination known as general education." Scorning the "pap" which is advertised as vocational education, Commissioner Marland denounced the general education provided to 50 percent of all secondary school students (1.5 million youngsters).

The Commissioner called for the elimination of the "general education" hoax. For the "unfortunate inmates" of the "general education" program, Marland proposed a true "career education," which 100 percent of the students could, and probably would, call upon at any time during their sojourn through secondary school. "Career education" would, therefore, lack the scorn of the "academic snobs."

Marland suggested that the goal of education in the seventies be that every high school graduate would either be prepared to enter higher education or "useful and rewarding employment" - "And I'm not talking about blacksmithing," exclaimed Marland.

A summary of the benefits of Title I ESEA would include the national commitment to upgrading the education of the poor, identification of the educationally deprived, and some excellent attempts to conquer the problem. But the money has been too little and too thinly spread to accomplish the intent of the law.

In addition to the crippling effects of underfunding, Title I has met serious administrative criticism at all levels. A Council subcommittee study of the available audits completed by the DHEW Audit Agency revealed that naivite, inexperience, confusion, despair and even clear violations of the law, have undermined the wise spending in some districts of already limited funds.

The Council's interest in these audits was further stimulated by the fact that so few State audits have been conducted during the five years of Title I.* Its review of the audits indicated certain recurring major violations. These ranged from administrative inexperience (such as losing interest monies unnecessarily, taking inventories improperly, and failure to time the receipt of materials and payment for them within the school year funding dates) to direct violation (such as spending Title I funds on college-level students, supplanting locally funded services with Title I funds, and paying salaries in questionable circumstances).

Yet even these do not adequately describe the extent of frustration of services to the educationally deprived. There are many difficult, though not fraudulent, cases where school administrators, beset and beleaguered with unusual budget pressures, were frustrated by the concentration guideline. As children were removed from a target school to a desegregated setting, efforts to have the Title I aid "follow the child" most in need were sometimes classified as general aid and were, therefore, reviewed.

The criticism most often launched against a local school district is that Title I funds have been spent as general aid - clearly an infraction of the law. Fourteen States audited from 1966 to 1970 were criticized for this infraction.

Some violations were classified as general expenditures for entire populations of students, poor or not, Title I eligible or not. Some were expenditures for the purpose of expanding a successful Title I program into the general educational program, and continuing to fund the Title I project in the same manner as before while funding the general program from other sources.

At the other extreme, there were cases of funding a program in a school which served poor children, some of whose parents grossed incomes of over $3,000 per year.

The Council's examination of the violations cited in the audits reveals that the degree, the intent, and the exercise of the infraction varied considerably from one State to another. This, however, does not excuse the apparent lack of compliance-mindedness

---

*DHEW State Audits

Number Completed	Year
0	1966
6	1967
7	1968
12	1969
15	1970

Source: DHEW Audit Agency (based on 40 audits)

on the part of Federal and State officials alike. Consequently, the Council advocates that appropriate corrective steps be taken to insure that an atmosphere of enforcement and legal conformity (compliance) surrounds such extensive program funding as that for Title I, ESEA.

The greatest academic need identified during evaluations of Title I programs was for compensatory reading programs. Two and one-half million pupils in Title I elementary schools in 1968-69 were judged by their teachers to require special reading programs. Most of these children were located in urban areas. In addition to general need among Title I eligible children, Spanish-surnamed students required bilingual instruction.

Compensatory education programs such as Title I ESEA cannot be considered in isolation from other controversial education issues, such as desegreation, integration, categorical grants, accountability, and more than equal treatment for the economically deprived. As a categorical grant with significant funding levels designed to accomplish wonders in the educational and social arena, Title I carries the overwhelming assignment of miracle worker.

The 1971 Annual Report of the National Advisory Council on the Education of Disadvantaged Children will present these issues with Council recommendations in light of the latest research and thinking of the educational community. More importantly, however, the Council will relate these issues and solutions to the effect they will have upon America's disadvantaged children, our foremost concern.

The Council is committed to the revolutionary dream of freedom and opportunity which swept this Nation in the 1770's. It suggests that the weakest link in the chain toward fulfillment of that dream is the educationally deprived, and consequently economically impotent, community of the 1970's. Title I ESEA is designed to serve this segment of our country, to strengthen it, and to foster self-reliance. The frustration of that service is contrary to the national interest and requires political responsiveness.

CHAPTER I. PARENT INVOLVEMENT AND ACCOUNTABILITY IN TITLE I: PROMISE AND PERFORMANCE

A direct result of the taxpayer revolt and its consequent reexamination of priorities has been the issue of accountability. In education this has meant increased interest in performance contracting, management techniques, and parent involvement. The Council encourages early and continuing parent involvement as an application of accountability. This is another way of broadening the integrity of the home school partnership.

The taxpayer, as never before, is asking for results from his school tax dollars. In education, the first level of accountability has been from the school board to the taxpayer. This relationship is founded on the execution of priorities in the education program of the school district and the examination of the expenditures of the school system to achieve those priorities. The next level is between the chief administrator (the superintendent) and the school board which hires him, examining whether or not this one person has administered their instructions throughout the local district. The staff must them report to the superintendent, the children to the staff (teacher), and the children to their parents, who are taxpayers. When the cycle is completed, the effect is often substantially different from the original charge to the board of education.

During a reading mobilization year, many children may still fail to read effectively. In a year of transferring to the 'new math', many children are still confused by abstract mathematics. And in any one year, it may be very diccicult for the parent-taxpayer, and ultimately the financially hard-pressed group of taxpayers, to understand the route of their tax dollars and the effectiveness of their expenditures.

Coupled with this lack of communication and understanding, the late 1960's were marked by continuing pressure from the voters for an accounting of the expenditure of their tax dollars. Bond issues were resoundingly and emphatically denied. Tax rate increases, where possible, were firmly rejected. Many school systems threatened to close, and some school systems had to shut down for lack of funds, and still tax raises were turned down at the voting booth. In 1971 mayors and governors are stating the same plea for funds, and the taxpayers are still in revolt.

Schools are not in crisis, governments are in contradiction. The political response has been retrenchment—reexamine priorities, cut costs, and demand 'accountability' in order to counter wasteful spending of the limited funds now available.

In the field of education this has meant the infusion of management specialists and business practices on a large scale. It is assumed that objective-oriented educational designs will mean a better education for the children and a better value for the limited dollars spent.

Thus we see the appearance of 'performance contracting,' an educational style whereby the school system hires an outside agent - usually industry - to apply new techniques to teach difficult classes, in return for which only success will determine the payment. If there is no success, there is no payment.

Who determines success? Usually a standardized test, many of which are now under heavy criticism for being 'culture bound.' But this is accountability.

The danger is that the industry may be accountable today and not tomorrow. In its zeal for instant success, it may have yielded to the temptation of teaching to the test instead of teaching the child. The Council, however, is not prepared to deny that with further experience and refinement, performance contracting may evolve into a very useful tool for the school administrator.

We also see a return to the standardized test and the need for national norms and comparisons. While educators are wary of the results of such standardized

testing, and minority groups are resentful of the limited cultural scope of the general information questions, the taxpayer seems to need a standard of assurance that his dollar is being well spent. Thus the respectability of these tests is renewed in political explanations of the performance of the local school system. Along with the implication of a need for developing a more reliable standardized test mechanism, it is apparent that accountability is politically ripe.

The Council encourages further educational research toward the immediate improvement of standardized tests currently being used to analyse the intellectual capabilities of all children. Particularly, the Council would applaud the development of testing devices which take into consideration the backgrounds of those children whose social and cultural experiences may differ considerably from those of the average American child.

Accountability is built into the design of Title I ESEA. The local district submits a plan to the State, which approves it on the basis of assurances it must give to the Office of Education.

Although provision has been made for public accountability of Title I funds, poor State administration of the program has made such precautions ineffectual. Twenty-five out of 38 States audited by the DHEW were criticized for poor administration. In one instance, a State developed a priority list for funding proposals and then proceeded to leave those with top priority the least amount of financial support. Another State renewed the application of a project which had been demonstrated to be ineffective. Yet another State used a file of receipts as its accounting procedure, without any orderly compilation of the expenditures made with Title I funds, such as use of a ledger.

Compounding their difficulty in altering this evidence of poor administration is the fact that most States do not have the money to staff adequately the departments in charge of monitoring. Yet the regulations require that they assure the Federal Government that appropriate measures have been taken to guarantee the proper expenditure of Title I funds. The Council is aware of the complications for State and local officials accompanying the current financial crisis. We feel it necessary, nevertheless, to insist that the most elementary standards of sound management and administration be employed throughout the implementation of title I programs, from the initial project design and application to the recording of fund expenditures and evaluation.

With the popularization of accountability has come the associated demand for more local control. Communities desire active participation in the decisions which affect their lives without spending large sums of money for 'overhead', namely, a bureaucracy to administer these decisions at all levels of government. In Title I, the evolution of mandated system-wide parent advisory councils is evicence of this trend, as well as an indication of Government's responsiveness to it.

Parent advisory councils are particularly essential in large school districts where school boards may not be elected, or where it is felt that the school board as a districtwide body may not adequately represent a Title I attendance area. The concept of the parent advisory council for Title I is an extension of the relationship of the school principal with his parents, and the school superintendent with his community. The main value of increased and mandated parent involvement is the intensified focus it usually generates on keeping Title I oriented to poor children.

A uniform comment from the studies the Council reviewed has underscored the relationship between the parent's value on education, the parent's understanding of the goals of the school system, the parent's subsequent cooperation with the school system, and the educational attainment of the child. Not only books and magazines, but also a genuine valuing of formal schooling in the home affects student performance. Parent involvement, with access to advisory councils, intensifies the integrity of such a home-school partnership in the formation of the child's destiny.

It is this type of accountability, founded on a communicative, informed partnership, which holds the greatest promise.

The Council regards the trend and popularization of accountability in education to be a healthy response of concerned citizens and an expression of local control. The Council recommends a further encouragement of parent advisory councils to effect optimum accountability, with appropriate provisions for and guarantees of technical assistance and access to public information.

CHAPTER II. TITLE I AND SCHOOL FINANCE

Education faces a fiscal crisis nationwide and this financial pinch has affected compensatory education programs. Two approaches have been suggested this year to alleviate this pressure: education vouchers, still in the experimental stage, and block grants with revenue sharing, now in heavy debate. The Council is observing these approaches and comments upon their implied effect on compensatory education.

The Secretary of the Department of Health, Education and Welfare, Elliot L. Richardson, stated on January 25, 1971:

> We are now engaged in discussions with the education community, seeking dramatic ways to simplify and rationalize this multitide of programs. The object of this exercise is to package Federal financial support of education to respond to local needs as perceived locally.This does not imply a removal of Federal requirements from grants of specific program funds - indeed, we intend to pursue those requirements (such as, Title I of the Elementary and Secondary Education Act) with vigor. Rather, we are seeking ways in which to reduce or eliminate red tape and unnecessary duplication, and to allow local school officials to seek assistance in solving local problems locally, not as defined by Federal statutes.
>
> This effort at consolidation and simplification shows the complexity of the Federal role in education. Education is both a national concern and a local matter. We are seeking a way to allow the Federal Government to watch over those interests whose protection is mandated by Federal law, while at the same time permitting local school officials the freedom to experiment and adapt.

The block grant is emerging as a remedy for present financial crises, aggravated by complex governmental procedures. Proposing a Federal Government which does not mandate complicated guidelines as it offers financial assistance, the Administration suggests block grants as an alternative to higher administrative costs. Red tape is cut while trimming the number of regulations needing enforcement.

Since the Federal Government now contributes approximately 6-7 cents for each education dollar spent, the Council is interested in the effect which block grants will have on education funding. The President's bill, Revenue Sharing Act of 1969, H.R. 13982, specifically excludes independent school districts from the definition of local government. The meaning of this is clear - school districts, as in the past, will have to approach their taxpayers or their municipal governments for funding requests. Under revenue sharing plans, the priority of spending for education will remain a matter for State and municipal governmental discretion.

By 1972 the Administration proposes to reverse the 10-year amoebic expansion of the Department of Health, Education, and Welfare. The Elementary and

Secondary Education Act of 1965, often referred to as the major reason for the present size of the Office of Education, would be streamlined into the Education Renewal Act of 1972 and the Education Assistance Act of 1972. By separating the education 'pork barrel' from education reform, the Administration hopes to untie the Gordian knot of bureaucratic allegiances, and rekindle enthusiasm for State-Federal partnership in education.

Education block grants would not be without categorical features. States would be given broad discretionary powers to use Federal funds for vocational education, aid to federally impacted areas, aid for children of low-income families, assistance to educate the handicapped, and education support services. Commissioner Marland has stated that Federal aid for children of low-income families will remain constant. This supports the President's fiscal year 1972 budget recommendations for education. The State—Federal partnership would reflect Federal funding and guidelines with State administration and broad discretionary authority.

In a business partnership, each party expects to have responsibility and an equal share of the harvest. At times, one or the other of the partners may take the lead in advocating or in strengthening a needed position. In the three-way partnership of Federal, State, and local governments, one might expect the same ground rules to be valid.

But there are times, because of a special identifiable national need, where one partner must take the lead. This is one of those times. The intermittent leadership role of the Federal partner, in this instance, should not be identified as an activity of domination. There can only be one quarterback.

The State-Federal Presidential Title I Internship, mentioned in chapter III, section 2, and fully described in appendix A, is an example of providing for a pool of competent and sensitive practitioners for this triple partnership to enhance the educational opportunities for poor children.

Each local education agency (LEA) is entitled to receive Title I funds through a formula based upon family income and Aid for Families with Dependent Children (AFDC) assistance data from county welfare departments. The funds come to the LEA, however, only after State approval of a project geared to meeting the intent of the legislation - "improving the educational attainment of educationally deprived children."

The States have generally given broad latitude to the LEA's on what constitutes a 'suitable' Title project for approval. As a result of strengthened parent advisory councils, the States have also come to recognize more and more that a locally approved Title I project application represents what both the local Title I administrator and the parents want. This then indicates that the wide range of approved projects appears to possess already some of the block grant features within a categorical program.

The experience of Title I, ESEA has shown that this federally supported program with numerous regulations has not been an example of Federal imposition upon the States' discretion and power. The States receive 1 percent of their allocation earmarked specifically for administrative costs. Federal audits are so infrequent that State discretion is undisturbed. Until 1970 there had been no compliance suits filed by the Federal Government for infractions of the law. During 1970 there were some hearings, but money has not yet been withheld for lack of compliance. This would give the impression that once a State has made the assurance to the Federal Government that it will take responsibility for the action within it, the State virtually has *carte blanche.* Infractions discovered by audits, parent advisory councils, or news reporters are the result of poor State monitoring and Federal default.

Block grants, then, would reflect a Government response to this reality and require no assurance that complicated guidelines have been executed. By limiting the number of strings, without entirely sacrificing the concept of "strings-attached," a compromise between reality and desirability would be achieved.

A second fiscal promise for the swift rescue of financially strapped communities is the education voucher. Welcomed by people of all political persuasions, the voucher plan is in the early stages of implementation. In any local education agency, a voucher worth the amount of 1 year's education expenditure would be given to the parents of a pupil. With this voucher, the child could attend any public or private school authorized to accept these forms. The school would then exchange the vouchers for funds with which to operate.

At this time, further study is necessary to assure that education vouchers do not counter the current laws regarding the free exercise of civil rights. We must be wary of the potential within the voucher system to encourage the mushrooming of private schools designed primarily to circumvent the philosophy of desegregation. Guarantees to the parent must also be part of the design so that children will not be victims of flagrant deception perpetrated by "hit and

run" purveyors of questionable education programs. Unless the education voucher system can be proved to be a worthy alternative to the current, though beleaguered, style of public education, it could turn out to be a disruptive detour to education renewal and reform.

Certainly all the facts about the effectiveness of performance contracting, block grants and education vouchers are not as yet in and a verdict on them by this Council in either direction would be premature. During its first year of appointment, the Council has been able to conduct only preliminary discussions of these concepts and plans to continue its examination of their respective merits and defects.

At present, nevertheless, cautionary views have been expressed by the membership with regard to the advisability of the implementation of any new educational styles without first incorporating sufficient assurances that they will coincide with current legislation. If Title I, for example, is to be blunted, diffused or displaced by any combination of these concepts, the Council feels there should be adequate provision within them for the same standards of equity embodied in Public Law 91-230 and Title I, ESEA.

Title I has been a vehicle for innovation in compensatory education. There are numerous examples of success, along with a number of examples of waste. Title I needs overhaul, but not major surgery. As a categorical grant program, Title I has given much discretion to the States. Even though it is primarily prescriptive, Title I has set priorities for spending without forcing the withdrawal of local initiative.

The Council recommends that consolidation of education funding include a strong program for the education of children from low-income families. The Council members stand ready to assist through consultation in the design of any contemplated changes of Federal assistance for compensatory education.

CHAPTER III. STATE DISCRETION AND DELIVERY OF SERVICES: AN ADMINISTRATIVE AND MANAGEMENT REVIEW OF TITLE I

The Council recommends several means to more effective delivery of services to the TITLE I eligible child even without an increase of funds.

The effective delivery of services to children is crucial to Title I, whatever deficiencies may exist in present evaluative techniques. Sound management of Federal programs cannot guarantee that educational progress of disadvantaged children will be accelerated, but even the possibility can be diminished for lack of appropriate structures for the delivery of services.

Data reviewed by the Council suggest that the "input" of Federal dollars, even if substantially increased, will not necessarily result in commensurate "output" of appropriate services to individual children unless there is careful review and revision of the policies and procedures for the distribution and expenditures of Title I funds. A useful, though not completely adequate, index of the problem is the wide variation among States and school districts in the average expenditure of Title I dollars per participant. The existing range of expenditures suggests not only the inadequacy of funding at the service level but also some inequity in distribution among eligible children in different States and districts. This is an addition to some evidence that many programs include significant numbers of ineligible or "low-priority" participants, while excluding otherwise eligible Title I children.

The Council is not suggesting that administrative revision is the sufficient, or even primary, requisite for improving the results of Title I. Further, we do not believe that more specific or detailed Federal legislation, regulations, or guidelines will achieve the desired effect. Rather we feel that the most promising direction for improvement lies in the fuller development of a constructive Federal-State partnership in delivering services to Title I children.

More specifically, we conclude that the critical discretion in the administration of Title I rests (as it should) with the State education agency (SEA) and that the Office of Education (with commensurate Congressional funding) can best direct its efforts toward providing information, counsel, negotiation, persuasion, and evaluation that will enable the States to satisfy the goals of Title I by meeting the peculiar needs of the target population within each State.

The SEA determines 1) how the Federal entitlement to each county will be suballocated among LEA's and, within LEA's, among candidate target schools and eligible pupils, and 2) the extent to which Title I funds can or must be concentrated (with or without complementary State or local funds for Title I purpose). Once the SEA has determined, through its guidelines and application procedures, how these matters will be handled, it also has the responsibility to monitor not only the compliance of the LEA with the State policy, but also the effectiveness of the SEA/LEA administration in achieving the Title I objective.

The Council believes that certain desirable characteristics of SEA administration can be identified generally, even though there is still wide latitude for adaptation to regional and local circumstances. These include:

1. A "concentration criterion" with a supporting rationale, by which the SEA will try to assure sufficient dollar expenditures per pupil to have significant impact. The Council doubts that at the present time an absolute amount can be fixed at the Federal level, but we do believe that Federal authorities should assist States in establishing a norm for their own jurisdiction.
2. An opportunity and incentive for LEA's to complement Title dollars with State and local

419-878 O - 71 - 2

funds available (even if not legislatively earmarked) to Title I purposes. Perhaps only in this way will the "concentration criterion" have the desired effect of increasing both the number of participants and the dollar expenditures per participant.

3. "Comparability criteria" that will insure that the two principles outlined above will result in equitable, as well as adequate, application of Federal dollars to increase the level of service to disadvantaged pupils. The recently adopted Federal guidelines on "comparability" should provide a basis for negotiation between the Office of Education and SEA's to see that workable "comparability criteria" are implemented.
4. "Suballocation criteria" that will incorporate the three principles above in such a way that special problems within counties (e.g. high concentrations of disadvantaged children in urban schools) will be recognized.
5. Provision for fiscal audits that will insure that actual expenditures have been in accord with budgets developed by the above criteria.
6. Provision for "program audits" that will assess the success of program components in really assisting the target population in overcoming learning difficulties. The effectiveness of program components must be measured in terms of pupil performance or other appropriate criteria; and the SEA's must assist the LEA's in developing evaluative and testing techniques to do this job.
7. Distribution procedures which will not penalize the LEA that integrates its schools. Title I funds should "follow the child" when desegregation occurs, and Federal guidelines should affirmatively support this principle by recognizing that target populations can best be identified by place of residence rather than school attendance patterns. There must be a consistent emphasis on the identification and service of individual pupils who need Title I, regardless of the school attended.

There is ample evidence that few of the above objectives can be realized by SEA's without strong support and counsel from Federal authorities, in both legislative and executive branches.

Attention to several important questions can enable the Office of Education, in its relations with the SEA's, to improve the delivery of services to children in local districts. The Council would suggest immediate emphasis on the following: State supplementary funding, State administration, Federal audits and evaluation, and Federal funding.

1. State Supplementary Funding

Does the State provide a supplement to Title I funding through either special grants for education of the disadvantaged or provision in the State aid formulas to recognize the special needs of those LEA's with large numbers of the disadvantaged?

Sixteen States appropriated special funds for the disadvantaged in 1968-69, ranging from $52,000,000 in New York to $80,000 in Utah. Four additional States had basic foundation programs with special features which took account of educationally disadvantaged children.

The startling fact is that the majority of States provide neither categorical assistance nor favorable criteria in the distribution of general funds. This may indicate a lack of commitment on the part of SEA's or State legislatures, or both, to the purpose of compensatory education. More directly, however, it highlights the problems which are inherent in attempting to set **national** standards for concentration of funds. In those States where supplementary funding is not available, uniform national concentration requirements may result in a drastic reduction in the number of children who benefit from Title I. This may result in better services to those few who are aided, while the educational performance of those who are not will deteriorate.

The Council recommends that Congress order the development of a plan of financial incentives to include bonus amounts to SEA's in States which provide supplementary funding to allow LEA's to concentrate funds. This effort could induce the States to become partners of the Federal Government by providing equal educational opportunities to *all* children. The form of providing the incentive should recognize discrepancies in State and local ability to fund basic noncompensatory education programs - perhaps by measuring State effort for compensatory programs against State and local expenditures for basic programs.

2. State Administration

Do the SEA's provide to their LEA's workable guidelines and help in achieving constructive evaluation of local programs?

Management by objectives, including strong mandates at the State level, can be a positive force in developing more effective programs for children. On the other hand, the SEA may do nothing more than create its own brand of "red tape" and extra paperwork which the Title I practitioner sees as an unnecessary burden in the performance of his job.

The Council has undertaken a review of State applications and guidelines. There is a striking disparity apparent in the quality of administration by the SEA's. Study of the documentation from the States with regard to fiscal management, parental involvement, selection criteria, public information, aid to nonpublic school children, and interpretation of Federal guidelines indicates that only in a few States is there significant interaction between the SEA and LEA's in the development of effective programs. But there are few examples of exemplary State administrative techniques.

At whose doorstep should this deficiency be laid? The Office of Education must bear its share of responsibility. Even with 5 years' experience with Title I, doubts persist regarding positive impact of the Federal Government on management practices of the SEA's. During the last year an intensive internal evaluation made by OE's Division of Compensatory Education provided promise of the development of a mechanism for continuous reciprocal counseling between Federal and State officials. Whether these recommendations will become practice remains to be seen. The Council recognizes the strengthening of the Office of Regional Coordination as an important first step.

The proposal for a State-Federal Title I Internship program (appendix A) originating with the Council is seen as one method by which a meaningful understanding of the State-Federal partnership may be developed. Until administrators at both Federal and State levels can understand the goals and problems of their counterparts little progress can be expected. We believe that the Office of Education must recognize the need for inservice training of its staff members and those who are expected to administer Title I in the SEA's. Much could be gained by having available a pool of outstanding Title I practioners from the SEA's whose services could be available to the Federal Government and the States. These experts could share their best thinking as to effective delivery of services with the SEA's which are most deficient in management controls, and they could assist in developing practical models for development of State guidelines and application writing to assist *all* SEA's and LEA's in making Title I work.

If the State applications and guidelines are going to become more than "necessary paperwork to get the money," a relationship of trust and confidence must be constructed. However, many "political roadblocks.. are in the way. This will require capable people in Washington and in the State capitals - but it will also demand an administrative structure which makes Federal monitoring a positive force rather than a potential threat.

Such a joint effort would seem especially crucial if Secretary Richardson's suggestion for simplification and combination of all Federal programs into block grants within five categories is to be implemented. If additional administrative discretion with regard to Title I funds is to be provided to the States without a dissipation of the existing effort to help the disadvantaged, there must be a strengthening of commitment at all levels to the effective delivery of services.

3. Federal Audits and Evaluation

Does the Federal program for monitoring SEA's assist in better delivery of services to disadvantaged children?

The Council reviewed 52 audits which were provided by the DHEW Audit Agency and which were completed by November 14, 1970. Fifteen States were audited for fiscal year 1969 and 24 for fiscal year 1968. It is the view of the Council that many of the completed audits are inadequate in scope - and there is an absence of any consistent policy in the monitoring process. In 10 States there have been *no* audits conducted since the passage of the Elementary and Secondary Education Act in 1965. This fact alone indicates that the Office of Education has lacked the necessary staff and resources to do an effective monitoring job, if that is the intent of Congress.

In recent months, there have been numerous criticisms related to alleged misuse of Title I monies and, more recently, of special desegration funding. It may be that effective guidelines on comparability, parental involvement, and concentration of funds will do more for fiscal control than any amount spent on monitoring procedures. But it seems that a prudent goal would be for DHEW to audit every State at least once every 3 years. To do this will require more staff and greater commitment to the development of the continuous communication between OE and the SEA's recommended earlier.

The recent study by the Council of the Great City

Schools on evaluation practices and exemplary projects in the large cities concluded that evaluation results at the State and Federal levels had little usefulness at the local level. The suggestion for continuous monitoring of projects and for "other aspects of process (or formative) evaluation in a nonthreatening and economically feasible way" holds great promise. But, as the study points out, and as this report has previously indicated, this will require a reordering of priorities within the States as well as the Office of Education. The Council urges reconsideration by Congress of the Federal and State monitoring and evaluative process toward this end.

4. Federal Funding

Does Congress hinder effective delivery of services through its appropriations process?

Prior reports of the Council have repeatedly stressed the handicaps to effective administration of Title I created by the Congressional funding process. If proper planning and evaluation of projects of the LEA's are to be encouraged, Congress should provide forward funding so that Title I practitioners and school boards can know what is available early enough to spend funds wisely.

Early and adequate funding commitments are also crucial to a better evaluative system. At the present time the LEA is faced with making its application for funds without any assurance that existing programs will continue. The incentive for continuous progress evaluation is absent, since the success of one program has little effect on the LEA's chance of getting another funded. Congress should consider requiring that a minimum of 5 percent of Title I project funds be expended for evaluations which would assist the planning process. But to impose this requirement Congress must also give assurance to the LEA's of funding much earlier than at present, so applications could truly reflect the evaluation-planning-program-evaluation cycle.

The Council is encouraged by recent indications that the Office of Education and the SEA's desire to improve communication, interaction, and mutual evaluation. This development should be aggressively supported, with all necessary funds and planning, to improve the delivery of services to children. Special efforts in training and administration of personnel at all levels in the process are needed; the Council believes that its recommendations, if implemented, will assist in the development of a new Federal-State partnership to meet the needs of disadvantaged children.

CHAPTER IV. QUALITY COMPENSATORY EDUCATION AND QUALITY INTEGRATED EDUCATION: A REPORT OF A THREE-YEAR LONGITUDINAL STUDY (FIFTEEN POINT PROGRAM) IN THE CITY SCHOOL DISTRICT OF ROCHESTER, N.Y., 1967-70

The Council highlights a study which has contributed to the available hard data which document the contention that the best program for children from low-income families is the combined compensatory education-desegregation approach.

To integrate or to compensate? - that is the question. Even Hamlet did not face as complex an issue as racial and ethnic isolation in the United States. The most affluent Nation in the world has in its midst pockets of poor families locked in isolated communities where there is little opportunity for change or escape.

While armies of citizens philosophize about human rights, civil rights and legal rights, housing remains essentially segregated by socioeconomic levels and by ethnic and racial concentrations. From many geographic centers residents developed a new concept, as precious as it was unconscionable, "the neighborhood school." Those minority groups which did not find their confinement advantageous or even acceptable, present to the American conscience the problem of legal inequity for all.

It is 1971 - 17 years after Brown vs. Board of Education of Topeka, and 8 years after the major civil rights thrust at Birmingham, Ala. Delays and shocks carry us from crisis to crisis, and finally to disillusionment and intermittent apathy. Our senses are dulled, our purses stretched, and still the voices from the ghettos, the "barrios," and the reservations cry out, identifying legally sanctioned inequity.

During the midsixties, the City School District of Rochester, N.Y., responded to the many divergent voices by developing a Fifteen Point Plan to reduce racial isolation and to create alternative solutions within its financial means.

On November 21, 1963, the Board of Education paved the way for its first large-scale open enrollment effort. After a number of sequential steps toward desegregation over the next 4 years, Rochester developed, in February 1967, several alternative plans. Significant features of the alternatives included reducing class size sharply, employment of teacher aides from the community, two-way open enrollment, employment of reading specialists, integrated prekindergartens, the World of Inquiry School (an integrated, urban-suburban experimental school supported by Title III program funds), and cooperation with interested community agencies and the Model Cities Project. The third and final evaluation report of the study, completed in September 1970, states:

Specifically, black pupils enrolled in racially-segregated compensatory and integrated classrooms were compared in terms of scholastic achievement as measured by selected standardized tests, school attendance, and social growth and work habits as perceived by the classroom teacher. In addition, white pupils who transferred from their predominantly white neighborhood schools to attend classes at an inner city school were compared with their home school counterparts and, whenever feasible, with their new classmates on the same basis.

At the beginning of the Fifteen Point Program, it was believed that at least three years of intensive follow-up of pupils participating in each of the components was necessary to assess the program adequately. Now, in retrospect, it appears that this choice was discreet since both pupil mobility and changing instructional emphases would have affected prolonged or plausible follow-up efforts.

The Council wishes to highlight the following special features which were assessed during this longitudinal study:

The selected features of the Fifteen Point Program covered by this report may be reduced to three major components. The first represents that style of education which has come to be known as "compensatory education." In this approach, no attempt was made to desegregate the racially imbalanced neighborhood school in the black community. Rather, energies and funds were channeled into avenues that permitted smaller class sizes by increasing the ratio of adults to pupils, and expanding provisions for supportive and remedial services.

The assumption on which compensatory education is based is the belief that greater pupil-teacher interaction yields higher pupil achievement. Stated specifically for this study, the more a teacher or an authorized adult works and interacts with at educationally disadvantaged pupil in his neighborhood school, where the average class numbers 15-18 pupils, the greater are the pupil's achievement and growth on selected scholastic measures.

The second component features integration of children by way of both the traditional manner; i.e., where black children transfer to schools which have predominantly white pupil populations (Integration-Out) and the reverse, a unique provision of pupil transfer in which children from predominantly white schools transfer into the core or inner city schools with a pupil population predominantly black (Integration-In at Clara Barton School No. 2 and Dag Hammersjold School No. 6. No overt attempts were made to restrict class size as characterized by the compensatory educational classes. Thus, the implicit benefits of integrated education are subsumed from the interaction of teachers and pupils in standard class size settings (average 27) where some pupil ethnic differences (and in this case economic differences) are prevalent. Stated somewhat differently, the pupil benefits derived in this context are believed to be associated with both teacher influences and the exchanges among/between classmates who have diverse backgrounds.

Segregation is the final component and represents the ethnic status at selected inner city schools where no overt intervention has occurred. It arises largely from housing practices exemplified in a particular neighborhood. While segregation exists in both white and black racially-dominated neighborhoods this study focuses primarily upon contiguous schools of the inner city. Hence, classes that are described as segregated refer to those consisting of approximately 24-28 black pupils who are essentially similar to each other in terms of socie-economic characteristics and who attend their neighborhood inner city schools. Specifically, selected pupils from classes at Clara Barton School No. 2 and George Mather Forbes School No. 4 represent the segregated pupils in this report.

NOTE: Because unusual pressures occurred at the Segregated Control School (No. 4) during the 1968-69 school year, two additional control type schools were identified and utilized in data analysis.

The objectives were sharply drawn—reducing racial isolation in the schools and providing a quality education for all children. The superintendent's four prospective solutions were as follows:

Plan I COMPENSATORY EDUCATION

The plan called for the reduction of class size in grades K-3 (15-18 pupils) and for the provision of extensive supportive services: employing a teacher aide for each room, utilizing a special reading teacher and a full-time elementary school counselor, introducing new educational media, and similar benefits.

Plan II INTEGRATION-IN

Under this plan, white pupils from outer-city schools were voluntarily transferred to inner-city schools with predominantly black enrollments. In addition, special programs in language arts, black history, and cultural enrichment were made available. Instruction in beginning French was provided for the intermediate grade pupils and specialists assisted the teachers to introduce Far Eastern studies, as well as to improve the teaching of reading, mathematics and science.

Plan III INTEGRATION-OUT

In this, the third of four plans, black pupils from the inner city were voluntarily transferred to predominently white schools located in the outer city. To enhance the program in these schools, supportive services were provided, but on a more limited basis than under the former two plans.

Plan IV SEGREGATION

Black pupils were retained in their neighborhood, inner-city schools. Supporting services, similar to those provided in Plans I and II, were initiated.

In sum, the study made it possible for the Rochester schools to compare the effects of integration and segregation and to assess the comparative benefits of providing extra program support.

In its final analysis, the study was impressive in its careful attention to comprehensive evaluation. For example, the effect of each of the four programs on the learning achievement of black students and on that of white students was carefully recorded. Tests of reading comprehension, word knowledge, arithmetic concepts and computational skills, and problem-solving ability were administered. In addition, data were compiled on school attendance, teacher perceptions of the students' work habits, and social growth. In short, much attention was given to a global assessment of the experiment: the comparative cost of each of the four programs was calculated, the social impact of integration was analyzed, absenteeism and other unanticipated developments were explored, and a strong effort was made to appraise the management problems created by each of the four options.

Among other questions, the study examined the following issues:

1. When black pupils are kept in a segregated school, does the reduction in class size (15-18 children in kindergarten through 3rd-grade classes) improve learning achievement?
2. How does the achievement of black children in a segregated school with reduced class size compare with the achievement of black children in racially integrated classes at inner-city schools and the achievement of black children in racially integrated classes at outer-city schools?
3. What are the effects of voluntarily transferring black children to predominantly white outer-city schools, and the reverse, voluntarily transferring white children to a predominantly black inner-city school?
4. Does the educational achievement of white children diminish in racially integrated classes?
5. Do black and white children perform equally well in integrated classrooms?

A relatively elaborate program of statistical analysis was used to evaluate the results. Moreover, the progress of pupils was monitored over a period of 2 or 3 consecutive years. Although the directors of the study acknowledged that pupil mobility, reassignment of teachers, and other limitations posed problems, they were convinced that their research conclusions had reasonable reliability. The following are noteworthy findings:

1. Black pupils enrolled in segregated classes at schools having enriched program emphases were not appreciably different in their scholastic performance from similar pupils enrolled in segregated classes at control schools.
2. Black pupils enrolled in compensatory classes achieved more than black pupils in segregated classes.
3. Black pupils in integrated classes achieved more than black pupils in segregated classes.
4. Black pupils in compensatory classes achieved as well as black pupils in integrated classes.
5. On the New York State Pupil Evaluation Program results, pupils in compensatory classes were the only group assessed which recorded gains in mean percentile standing during the first two grades of school.
6. Black pupils in integrated classes at their neighborhood school were not appreciably different in performance from similar pupils in outer-city schools.
7. There were no appreciable differences in achievement between white pupils in inner-city schools and white pupils in their own neighborhood schools.
8. Black pupils attending segregated classes fared least well on the measure used for assessing pupils enrolled in the various plans.
9. Black pupils and white pupils who scored similarly on pretest measures and who attended integrated classes tended to have similar scores 3 years later.
10. Black pupils integrated at the primary level (grades K-3) showed relatively higher scholastic gains than those black pupils who were integrated at the intermediate level (grades 4-6).
11. Pupils having a stability in residency during the period studies reflected higher achievement gains.
12. Children who attended schools in their own neighborhood recorded fewer absences than those enrolled in schools outside of their residential district.

The tabulation which follows indicates the comparative benefits of the four plans.

Rank Order of the Four Plans

Achievement in Order of Effectiveness	*Plan*	*Cost*
1	I Compensatory Education	1 (Highest)
2	II Integration-In	2
3	III Integration-Out	4 (Lowest)
4	IV Segregation	3

The evidence from the Rochester study would seem to suggest that compensatory emphases are appropriate in overcoming the disadvantages of segregation. By inference it would appear that such compensatory services would yield the greatest student benefits if provided in integrated classrooms.

A. *Unlike one type of Compsnsatory Educational Program in New York City, (MES), the Rochester Compensatory Educational approach showed measurable benefits over a three-year period.*

B. *While six recent cross-sectional studies found minority integrated pupils' performance to be higher, the evidence was suspect because control measures were not adequate (Radin (1966) Ypsilanti, Mich., Jessup (1967) New York City; Meketon (1966) Kentucky; Lockwood (1966) New York State; Matzer (1965) California). The evidence shown in the Fifteen Point Program is quite conclusive, i.e., integrated minority pupils recorded higher achievement gains than segregated minority pupils.*

C. *Evidence demonstrated in the Fifteen Point Program corroborates that found in other studies (Coleman, 1965; Fortenberg, 1959; U.S. Commission on Civil Rights, 1967) that the younger children are when they enroll in integrated classes, the higher the probability of scholastic success. (Abstract, pp. 4-5)*

A more extensive presentation of the costs and cost theory involved with the implementation of these four plans can be found in appendix D.

It is interesting to note that the findings of the Rochester study closely parallel the conclusion of the President in his Message on Education that there is a necessary linkage between compensatory education and desegregation measures.

The National Advisory Council has considered the Administration's increased interest in desegregation and the enactment of the President's bill, Emergency School Aid Act of 1970, H.R. 17846. The Council highlights the findings of the Rochester study and the stated goals of the President by concluding that the best compensatory education program appears to be desegregation. We may also conclude that, if Rochester is typical of other cities in the Nation, it appears most desirable to encourage further desegregation of the schools and, concurrently, to make effective compensatory provisions available to disadvantaged youth who attend these racially desegrated schools.

CHAPTER V. CULTURAL DIFFERENCE IN THE "MELTING POT" SOCIETY

The Council proposes that cultural differences have been, in part, a contributing factor in the poor performance of low-income children on "culture-bound" standardized tests. The Council suggests that members of the education establishment have assistance where necessary for better understanding and sensitivity to cultural differences. The Council expects that respect and recognition of the United States' cultural diversity in school programs will improve the performance of children from low-income families, and consequently their educational attainment.

"Don't go beyond the level of your raising," an Appalachian mother with a 9th-grade education warned her school-age youngster. In an effort to free the disadvantaged child from economic bondage and educational shortchanging, compensatory education programs have too often separated the "raisings" from the "risings."

"Today there is widespread - if tardy - recognition that one of our country's richest assets is its cultural and linguistic diversity," explains Dr. Terrel H. Bell, former Acting U.S. Commissioner of Education.

Both of the foregoing comments illustrate the same concept - that cultural difference is a natural resource to be prized along with efforts to attain economic viability for our children.

A nation created by earlier dropouts from European societies intolerant of minority views and lifestyles cannot continue to pursue a course which discriminates among its resident citizens. The Council has come to believe that America's schools still have some distance to go to assure each minority pupil the freedom to express openly and with pride his own unique cultural heritage. We recognize this basic freedom as an important prerequisite to addressing the problems of poverty, as are the usually cited issues of economic self-sufficiency and the right to a good education.

The last century's melting pot has become this generation's cauldron. Spokesmen for culturally different minority groups in this country have let it be known that their people no longer wish to assimilate, to fade into the masses, to emulate the image of those who have won economic success in our society. On naturalization day, the first day of their newly-won American citizenship, immigrants are often told not to forget their heritage and sacrifice their background, for the United States would only be the poorer without them. Yet, in order to compete in the job market, many sublimate their culture to be more like the neutral man, to them a cardboard pattern of a soulless person.

The Council believes it is significant that ethnic groups, including Appalachians, Blacks, Cubans, Indians, Mexican-Americans and Puerto Ricans are seriously questioning whether they will follow the same pattern in the future. Cultural expression has won respectability, and the courage to practice one's own heritage is now not only an acceptable, but a preferable trait. Whether or not our educational institutions honor this new cultural expression may well have more to do with solving the educational problems of minority groups than any other single factor.

Yet among the poor, children are deprived of the necessary ego strength stemming from family stability, secure peer relationships, and help in reaching realistic goals. Poor children lack the serene, middle-class faith in the future. Because of this, many lack self-control, cannot risk failure, will not accept criticism, cannot take two steps backward to go one forward, have no regular study habits and few basic skills. In short, their condition is educationally deprived and its source is mostly their poverty.

Nevertheless, a former school board chairman declared: "We have no inferior education in our schools. . . What we have been getting is an inferior

419-678 O - 71 - 3

type of student." Educational achievement studies have consistently pointed out that one of the most important factors in determining educational success is whether the child feels he has some control over his life. This feeling of self-sufficiency and independence has been frustrated by a number of factors - the monocultural emphasis of our school curriculums, the lack of training and therefore understanding among teachers of culturally different children, and intelligence and psychological tests which place a high emphasis on the child's ability to identify the symbols of a majority culture.

Strict cautions must be observed to be certain that children from minority groups are not prematurely assigned to classes for slow learners or the mentally retarded, based upon inconclusive evidence. In addition, children so assigned must not be retained in such classes 1 day beyond the availability of evidence that the pupil is ready for an upgraded class placement.

The National Advisory Council pursued these issues by establishing a subcommittee to examine the phenomenon of cultural diversity. The findings are sobering. The average educational attainment for Appalachians is 8.5 school years; for Indians, 5 school years; and for Mexican-Americans, 7 school years. In 1970 the U.S. Census Bureau reported that there was a large increase in the number of black high school graduates - 65 percent as compared with only 40 percent in 1960. Notably in one State, the frequency of students' being penalized for speaking Spanish in school is startling.

The Council strongly endorses the determination of former Acting Commissioner of Education Bell, who remarked, "We must muster all available assistance - public and private - to change educational attitudes that have resulted in educational failure for thousands of young Americans whose only fault was the possession of a different language and a different culture."

A serious deficiency of the educational system is the lack of emphasis on cross-cultural experience. Even though there is a seemingly high exposure for Americans to other cultures through the mass media, this exposure is illusory because it is passive. Only by living in a different cultural context, going to school with children from different backgrounds, and experiencing other behavioral patterns and cultural traits does an individual become really aware of the cultural distinctions which are uniquely his own or gain respect for those of other people. If the goal of education is to teach people how to learn and to function effectively with other people and institutions with whom they may have contact, such experiences are not only valid but essential. Serious attention needs to be given to research and demonstration projects which allow teachers and students to gain a new understanding of the nature and importance of cultural pluralism in a democratic society.

Until now many school systems have been successful at what society wanted them to do - obliterate the differences and adjust children to the technological society as obedient integers. The schools are the world's most relentless channeling devices for those students who do not drop out of them.

Society has now begun to demand a democratic framework for student activity. Pupils are being offered opportunities for independent work, school-work programs, and time for creative expression. Cultural history courses have yet to reach full maturity, but they have done much to salvage some of the self-esteem deprived children used to lose as they matured.

James Coleman tells us that the most important thing in determining educational success is whether the child feels he has some control over his life. If the unique heritage from which he comes is destroyed by efforts to make him acceptable to the ideal social norm, instead of being merely modified by that effort, the resultant human being can only feel powerless in a majority society.

The very concept of a "majority society" in the United States is, however, the primary error. As an operating theory, "the melting pot" is invalid. Our Nation of minorities who fled from cultural and religious oppression must ask itself if repeating the error is worth the sacrifice of a culturally rich, total enrivonment. We have the unique opportunity to be a world miniature, a viable world society.

The Council is not seeking cultural tolerance, for that implies that one culture is sufficiently superior to another to tolerate the rest. The Council seeks, instead, an orchestration of cultures performing as one Nation.

Accordingly, the Council urges educators to give attention to the development of culturally pluralistic curriculums and cross-cultural teaching techniques. We would hope that this would emerge as a respected and popular element in the American educational structure. Because an educational system which recognizes and capitalizes on the unique cultural differences is so important for the education of poor children, Title I funds should legitimately be spent in this field.

The Council recommends that State education agencies be required to ensure that the applications of their local education agencies provide for curriculum materials which are based on the children's cultural background; and that the applications provide for teacher preparation and inservice training programs which are oriented to the affective factors of teaching culturally different children.

We also recommend that local and State education agencies reinforce expectations that publishers develop culturally oriented and culturally pluralistic materials. To facilitate the creation of culturally based instructional materials, Title I should be amended to provide the appropriation of $25 million which would permit the Commissioner of Education to enter into contracts with local school districts, State school agencies, universities, and private organizations—profit and nonprofit. These materials would be for initial use in Title I programs. Priority would be given to organizations and institutions with first hand knowledge of various cultural groups and demonstrated skill in developing these greatly needed materials.

CHAPTER VI. SUMMARY AND RECOMMENDATIONS: WHAT WE CAN DO NOW

Concluding comment and summary of the Council's recommendations.

From its inception, the goal of Title I has been to break the cyclical menace of educational and economic deprivation. With funds in excess of $5.5 billion since 1965, Title I has assisted State and local education agencies in relieving the deplorable reality of disadvantage which encircles nearly 17 million children.

The present financial dilemma hamstringing State and local governments has reached crisis proportions. Unfortunately, the victims are the same educationally deprived youngsters whose plight was the inspiration for Title I, ESEA 5 years ago. Many local officials have been hard pressed to meet the persistent educational needs of these children. Out of desperation, more than with any deliberate intent to circumvent public law, some officials have relaxed their commitment to meeting standards of fund concentration, comparability, and parent involvement.

While the National Advisory Council understands the scope of their financial difficulties, we see no alternative but to insist on the rededication of Federal, State, and local officials to following the intent and prescription of public law.

CONCENTRATION

The Council endorses the recommendation of its predecessor, which called for "adherence to the principle of concentrating funds where the need is greatest so that a limited number of dollars can have genuine impact rather than being dissipated in laudable but inconclusive efforts." We applaud the efforts of some States to raise concentrated educational expenditures to as much as $300 per pupil. These represent a genuine response by SEA's, even in times of financial distress, to the principle of concentrating educational services on a limited number of children. Where desegregation is occurring, the Council recommends a "follow the child" approach.

COMPARABILITY

The Council believes that a desirable feature of State educational agency administration is the stipulation of comparability criteria. These standards would insure that the principles of concentration and incentives will result in equitable, as well as adequate, application of Federal dollars to increase the level of service to disadvantaged children. The recently adopted Federal guideline on "comparability" should provide a basis for negotiation between the Office of Education and the State education agencies to see that workable comparability criteria are implemented.

PARENT INVOLVEMENT

During the past year, the Council contributed to the preparation of new guidelines on parent involvement which were sent to the State education agencies in late October 1970 (see appendix B). The Council is convinced that an effective means of obtaining the cooperation and support of the community in achieving successful compensatory programs is to enlist the talents of parents. Manifold benefits stem from the creation of three-way communication among parents, teachers, and school officials:

- Parents are encouraged to feel that their advice is welcomed, that their contributions are used by the schools, and that parental apathy and hostility towards the school are unfounded.
- A more accurate and equitable procedure is established for the collection and dissemination of information relevant to the education of the child.
- The child begins to realize that a broad spectrum of adults around him is concerned and interested in

his education. This is most helpful in reducing the disparity that often exists between the lower-class atmosphere of the home and the middle-class atmosphere of the school.

- The teacher is stimulated to bring her teaching and outlook closer to the basic needs and problems of the child and his cultural community.

- Specifically, parent involvement attacks a problem to which we have assigned top priority in the future - the diversification of educational methods and goals that will acknowledge the cultural diversity of children in our schools.

- Parents become familiar with the administration of the educational programs. They become capable of making constructive contributions which acknowledge the complexities of educational systems and their management. They learn to talk with the teachers and, in the same process, the teachers learn to talk with the parents.

- Parents help ensure that Title I programs and funds are used wisely in the improvement of educational opportunities for their children. They help keep Title I oriented toward its basic objectives.

- Generally, parent advisory councils served to enhance the worth of education and the dignity of parenthood; they contribute a spirit of integrity to the educational process.

The Council is cognizant of existing arguments against the formation of parent advisory councils, and it recognizes that such arguments are sometimes justifiable. Some parent advisory councils have been either politically disruptive or apathetically neutral. On balance, however, the Council is persuaded that the merit of the parent advisory council mechanisms established to date has been overwhelmingly positive.

While we are pleased with the accomplishments of parent involvement, we feel it essential that, insofar as possible, teachers in disadvantaged areas must perceive the needs of parents and, in turn, parents feel a sincere involvement in the education of their children and their schools. We recommend that Federal administration of Title I encourage the establishment of parent advisory councils beyond their present mandate at the system level to each target area school.

Whereas Title I has placed primary emphasis on the child, we feel there is further need for extending the insights of parents and teachers. For children to realize their full potential, they must be influenced and guided by parents who both accept their parental roles and strive to improve their personal competence. We recognize an additional need for legislative authorization to develop programs for parents and parenthood. Simultaneously, we endorse existing support for teacher preparation and development in the hope that such programs can be given special emphasis for teachers in disadvantaged areas.

Finally, consistent with the guidelines providing for accessible public information, we recommend that such information should be disseminated to all interested cultural groups in language familiar to the community and accounting for bilingual backgrounds where appropriate.

DELIVERY OF SERVICES

The Council recommends that Congress order the development of a plan of financial incentives to include bonus amounts to State education agencies in States which provide supplementary funding to allow local education agencies to concentrate funds. The form of the incentive should recognize discrepancies in State and local ability to fund basic noncompensatory educational programs--perhaps by measuring State expenditures for compensatory programs against State and local expenditures for basic programs.

We believe that an understanding of the goals and problems of their counterparts must be developed among administrators at both Federal and State levels. Proposals, such as the State-Federal Presidential Title I Internship program originating with the Council, are methods by which this desired State--Federal partnership may be developed. The Office of Education must recognize its obligation to provide inservice training of its staff members and those who are expected to administer Title I in the State education agencies.

If proper planning and evaluation of projects at the local education agency level are to be encouraged, we recommend that Congress provide forward funding in order that Title I practitioners and school boards may know what funds are available early enough to apply them wisely.

The Council is encouraged by recent indications,

such as the Belmont Project, that the Office of Education and the State education agencies are working together to improve communication through a more systematic and regular exchange of information on project design and evaluative techniques. Such efforts should be aggressively supported, with all necessary funds and planning, to enhance professional understanding and ultimately to improve the delivery of services to poor children.

DESEGREGATION

The Council noted in its 1969 Annual Report that "school desegration and compensatory education are not an either/or proposition, but are mutually complementary actions which can lose much of their effectiveness in isolation from each other." The Rochester, N.Y., study serves as a prototype for the successful combination of these two concepts. The Council suggests that such program designs provide a much-needed, graduated response which can be applied according to the educational and financial resources of the community, instead of an "all or nothing" ultimatum.

By combining and coordinating the use of Federal funds available for school desegregation and extensive support of disadvantaged children, wherever they are, integrated or still to be integrated, the money could be effectively directed toward the common goal - improving opportunities for the disadvantaged. After a proper assessment of needs, an assembly of resources from all agencies could target on this goal.

Although the education voucher concept is still in its infancy, the Council wishes to caution that appropriate steps should be taken to incorporate safeguards to insure that the voucher system will not obstruct or divert efforts toward desegregation.

While its 1971 Annual Report focuses on Title I, the Council recognizes the importance of comprehensive local planning efforts so that Title I programs not fully funded can, by coordination with other programs, gain impact.

The Council further reiterates its conviction that all administrative levels of government must exercise responsible initiative to insure that Title I benefits "follow the child" whenever desegregation efforts include the transfer of disadvantaged children to schools whose student populations consist of socio-economically advantaged children.

REVENUE SHARING

The President's State of the Union Message of January 21, 1971, outlined a proposal for more equitable distribution of tax revenues between Federal and State levels of government. While the Council recognizes that there are values to be derived from shared revenues and block grants, there is need of assurance that educational programs and services for low-income families will receive the priority that they are due in the allocation of funds by the State and local education agencies. The Council stands ready to assist through consultation in the design of any contemplated changes of Federal assistance for compensatory education.

CULTURAL DIVERSITY

The Council recommends that State education agencies be required to ensure that the applications of their local education agencies provide for curriculum materials which are based on the children's cultural background. Further, the Council recommends that applications provide for teacher preparation and continuing inservice training programs which are oriented to the affective factors of teaching culturally different children.

We also recommend that local and State education agencies reinforce expectations that publishers develop culturally oriented and culturally pluralistic materials. To facilitate the creation of culturally based instructional materials, Title I should be amended to provide for the appropriation of $25 million which would permit the Commissioner of Education to enter into contracts with local school districts, State school agencies, universities, and private organizations—profit and nonprofit. These materials would be for initial use in Title I programs. Priority would be given to organizations and institutions with first-hand knowledge of various cultural groups and demonstrated skill in developing these greatly-needed materials.

In conclusion, as our cover letter from Mega City pupil Steve Miller indicates, "Title I is helping." Title I is helping some children more than others. Title I is helping to involve parents in their children's education and provide employment for school aides from the neighborhood. Title I is helping to provide additional training for school aides and other paraprofessionals. Title I is helping to obtain needed equipment and supplies for teaching, testing and evaluation of pupil performance. Title I is helping to measure Steve's and Tom's educational progress. Title I *is* helping.

APPENDIXES

A. Presidential State-Federal Title I Internship Proposal 29

B. NACEDC Extended Comments on Parent Involvement, October 1970. 31

C. Cost Cost Analysis of Three Year Longitudinal Study (Fifteen Point Program), Rochester, N.Y. 35

D. Comparative Study Chart of Title I Evaluations completed since January, 1969. 39

E. Recapitulation of Recommendations of Previous Council. 45

APPENDIX A.

PRESIDENTIAL STATE-FEDERAL TITLE I INTERNSHIP PROPOSAL

PROBLEM Ineffective State-Federal-local liaison communication for improved functioning of Title I

PROPOSAL

Provide for the exposure of selected personnel from SEA's and LEA's to the programs and policies of the Office of Education concerned with the Presidential announcement and support of a 1-year internship for one supplicant from each State, to be conducted by the Division of Compensatory Education, followed by the dissemination of the information and experience gained by the intern to key personnel of SEA and LEA's in his State.

OBJECTIVE

Improve the delivery of services through Title I to disadvantaged children and strengthen communication and coordination between the SEA's, LEA's and DCE

ADMINISTRATION

1. One intern to be nominated by each SEA and appointed by the President.
2. Eligible candidates would be drawn from the staff of the SEA or from LEA's in the State, with the selection criteria based on the ability and commitment of the applicant to improve programs to assist the educationally disadvantaged child.
3. Each intern would complete a thorough orientation to the programs and problems of his SEA before commencing the internship.
4. Those selected would spend 9 months in Washington and other appropriate locations as "Presidential State-Federal Title I Interns," receiving comprehensive managerial training in the delivery of Title I services to disadvantaged children. The intern program, to be conducted by the Program Support Branch, DCE, would provide to each participant a broad exposure to specialists in instructional problems and all phases of Title I operations and to experts in bilingual programs, migrant education, non-OE community action services, and relations with nonpublic schools.
5. After completion of the 9-month period, the intern would return to his SEA for a program of communication with SEA and LEA Title I specialists, the duration and content of this obligation to be developed by the individual SEA.
6. Funding for the Washington internships and the subsequent service with the SEA would be through Federal monies, supplemented as practicable by foundation support.
7. The SEA can establish conditions for postinternship service if it desires.
8. Compensation would be based on the applicant's existing salary level in the SEA or LEA, adjusted for cost of living differentials and travel expenses.
9. Internships would commence on July 1, 1971. (They could be staggered to start at varying times. Effective management techniques prohibit the accommodation of 50 interns at the outset.)

APPENDIX B

NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN

WASHINGTON, D.C.

W.W.E. Blanchet
James Branscome
Father Pierre DuMaine
Nelson Gross
Vivian Lewis
Alfred McElroy
Frank Raines
Robert Ridgley
Louis Rodriguez
Ralph Tyler
Sheldon White
Herman R. Goldberg,
Chairman

October 26, 1970

Dr. Terrel H. Bell
Acting Commissioner
Office of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Dr. Bell:

As requested, the National Advisory Council on the Education of Disadvantaged Children submits its recommendations urging the Acting Commissioner to act on Section 415 of Public Law 91-230 by stating his determination that parent involvement does improve education programs and that it should be universally encouraged.

The NACEDC was established by statute to comment on Title I, ESEA, to evaluate the effectiveness of compensatory education programs and to recommend possible improvements of Title I. The Council believes parent participation is a necessary component in the effective operation not only of Title I, but of all education programs.

In 1969, the NACEDC Fourth Annual Report stated:

"Parental and Community Involvement

"No school or program can by itself hope to overcome the manifold effects of disadvantage. A youngster spends at most six hours a day in school; the rest of his waking hours are learning hours, too, and compensatory education cannot outweigh the influences of the home and the neighborhood on a child.

"This means that if Title I is to be successful, it must be part of an alliance between parents, community residents, and educators. Parents must understand what the school is trying to achieve, so that they can extend the effects of compensatory education by encouraging learning at home. Other local adults can frequently supplement project funds with their own resources of interest, inventiveness, and special ability. Parental and community involvement represent a way of harnessing the voluntary spirt - which has always been a remarkable feature of American life - to expand the benefits of limited Title I funds.

"We commend the Office of Education's recently issued policy guidelines suggesting the establishment of local advisory committee to enable parents and other citizens of the local community to become involved in the planning, operation, and appraisal of compensatory education programs. We further urge state education agencies to encourage and assist local school districts in implementing the principle of parent and community involvement in Title I programs."

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This position reflected the past Council's endorsement of Section 116.18 of the Title I regulations added November 28, 1968 which states:

> "each local education agency shall provide for the maximum practical involvement of parents of educationally deprived children in the area to be served in the planning, development, operation and appraisal of projects, including their representation on advisory committees which may be established for the local Title I program."

As a result of Section 116.18, many voluntary local advisory groups were formed throughout the nation, producing new political expression for disadvantaged minorities. In the most successful prototype, minority groups, practiced representative democracy through which they gained familiarity with the administration of education programs, especially Title I.

Where there had been apathy and lack of representation, a mechanism was now available to express the concerns which frustrated local community leaders. Furthermore, more militant and aggressive groups found a constructive channel to express their views. This brief experience with parent advisory groups for Title I indicates that the existence of this opportunity generates increasing parent interest which, in turn, brings a larger number to seek representation on the council and to become active in educational affairs.

Parent advisory councils also communicated the spirit of the community to school administrators, and the concept of voluntary parrent advisory councils embodied in Section 116.18 was realized.

It is now apparent that one Title I advisory council for a large school district may be inadequate. The NACEDC recommends that to make parent advisory councils more effective and to guarantee better parent representation on the councils, that the Office of Education declare to the States that local target Title I school advisory councils be an essential part of the local education agency's Title I application.

President Richard Nixon, in his March 3, 1970, message to Congress on education reform, reaffirmed his commitment to increase local community responsibility.

> "The problem is that in opposing some mythical threat of 'national standards' what we have too often been doing is avoiding accountability for our own local performance. We have, as a nation, too long avoided thinking of the productivity of schools.
>
> "This is a mistake because it undermines the principle of local control of education. Ironic though it is, the avoidance of accountability is the single most serious threat to a continued, and even more pluralistic educational system. Unless the local community can obtain dependable measures of just how well its school system is performing for its children, the demand for national standards will become even greater and in the end, almost certainly will prevail. When local officials do not respond to a real local need, the search begins for a level of officialdom that will do so, and all too often in the past this search has ended in Washington.
>
> "I am determined to see to it that the flow of power in education goes toward, and not away from, the local community. The diversity and freedom of education in this nation, founded on local administration and State responsibility, must prevail."

The NACEDC supports this Presidential commitment to local control of education.

Mr. Nixon also raises the issue of accountability as part of the issue of local responsibility. Active parent involvement in the form of meaningful parent advisory councils is one means of channeling the effort toward accountability as a positive force. The ultimate benefit to the educational program and to the students the schools serve is sufficient justification for proceeding in this direction.

Although the NACEDC applauds all forms of parent participation, we prefer the formal structure of an advisory council for each target school building. In addition, we recommend that, in school districts above a given size - that critical size to be determined by the Division of Compensatory Education - there be a parent advisory group to the district. The membership of this district council should include delegates from each target area council.

Therefore, we recommend the enclosed draft guideline for your consideration. We appreciate the opportunity to express these views to you and look forward to the release of your policy statement on Friday, October 30, 1970.

Sincerely,

Herman R. Goldberg

Herman R. Goldberg, Rochester, N.Y.
Chairman

W.W.E. Blanchet, Fort Valley, Ga.
James Branscome, Washington, D.C.
Father Pierre DuMaine, San Francisco, Calif.
Nelson Gross, Hackensack, N.J.
Vivian Lewis, Wilberforce, Ohio
Alfred McElroy, Port Arthur, Tex.
Frank Raines, Seattle, Wash.
Robert Ridgley, Portland, Oreg.
Louis Rodriguez, Phoenix, Ariz.
Ralph Tyler, Chicago, Ill.
Sheldon White, Boston, Mass.

HRG/lwp
Enclosure

33

APPENDIX C

COST ANALYSIS OF 3-YEAR LONGITUDINAL STUDY (FIFTEEN POINT PROGRAM) ROCHESTER, N.Y., 1967-70

All of the accompanying figures and/or totals are based upon those items included in table I. It is important to note what they are since the definition of "Instructional" expenditures is somewhat different from the usual one. *Only those costs that related directly to the learning activities of pupils were used.*

Table II reflects the per pupil instructional cost (as defined in table I) for each of the different components. In addition, the per pupil instructional cost for students enrolled at the 34 other elementary schools was averaged for each of the years analyzed. Note that the average 3-year total cost at 34 schools was $1,321 per pupil. However, the 3-year total cost per pupil at School No. 3 (Compensatory) was $2,466, almost twice as much as the former (86.7%). Also presented in table II are different referent indices that provide additional comparison bases.

The 3-year average (1967-70) per pupil costs are shown on the diagonal in table III. Off-diagonal amounts reflect the differences for each of the programs assessed. For example, Integration-In at School No. 2 cost approximately $333 less per pupil per year than the Compensatory program at School No. 3.

CONCLUSIONS

1. Pupils involved in Compensatory classes incurred the greatest average costs, i.e., $822 per year. They also showed the greatest relative gains in achievement during the 3-year period studies, since they ranked lowest on pretest measures. However, was it worth it? The answer appears to be NO! Both black pupils participating in Integration-In (No. 2) and Integration-Out (8 schools) showed almost the same growth but at approximately 3/5 the cost (59.5% and 54.1% of the Compensatory costs respectively).
2. Expenditures affixed to maintaining Segregated classes at School No. 4 were not too different from those required to integrate children at School No. 2 and 8 outer-city schools (No. 4 = $475 AV/CYR; No. 2 = $489 AV/C/YR; 8 outer-city schools = $445 AV/C/YR). Since transportation costs were not included in the operational definition of instructional costs, the latter two averages should be increased somewhat if these costs are included in the interpretation.
3. Excluding transportation expenditures, the annual per pupil average difference for instructing children in an integrated inner-city setting, e.g., School No. 2, or at 8 outer-city schools, was $44 (table III). Although the 3-year achievement gain favored the School No. 2 integrated black pupils slightly, it was not great and may have resulted from the enrichment activities. In effect, Integration-Out appeared to have almost comparable long-term achievement effects at a reduced per pupil expenditure (of $44 per year).

TABLE I—FIFTEEN POINT PROGRAM INSTRUCTIONAL COSTS

INCLUDED	EXCLUDED
1. Teacher salaries	1. Central Office professional salaries (including instructional services and pupil personnel services)
2. Building administrative salaries	2. Civil service salaries (operation & maintenance, clerical, and other)
3. Teacher aides	3. Equipment
4. Instructional supplies	4. Office supplies
5. Text books	5. Maintenance supplies
6. Work books	6. Custodial supplies
7. Pupil periodicals	7. Insurance
8. Library books	8. Fuel, lighting, power, water, & telephone services
9. Records, tapes, films	9. Service contracts
10. Professional and technical services	10. Repair contracts
11. Travel: in and out of District	11. Lunchroom costs
Funding Sources: Local funds; 15 Point Program (State); Project Beacon (State); Title I (Federal)	12. Employee benefits (retirement, social security, and health & life insurance)
	13. Pupil transportation

TABLE II—FIFTEEN POINT PROGRAM COMPARATIVE COSTS

	1967–68		1968–69			1969–70			3-Yr. Total	
	C/P	% Cmprd #3	C/P	% Cmprd #3	% Cmprd 67-68	C/P	% Cmprd #3	% Cmprd 67-68	C/P	% Cmprd #3
Compensatory #3	$715	100.0	$870	100.0	121.7	$881	100.0	123.2	$2466	100.0
Integration-In #3	453	63.4	527	60.6	116.3	486	55.2	107.3	1466	59.5
Segregation #4	425	59.4	493	56.7	116.0	507	57.5	119.3	1425	57.8
Integration–Out #1, 7, 23, 30,38 , 39, 41, 46	387	54.1	457	52.5	118.1	492	55.8	127.1	1321	54.1
All Other Elem. Schools (N=34)	397	55.5	443	50.9	111.6	481	54.6	121.2	1321	53.6
Total Budget	$47,143,630		$54,209,298		115.0	$58,321,674		123.7		
Consumer Price Index	100.0		105.4			111.1				

TABLE III—DOLLAR DIFFERENCE IN PER PUPIL COST BY PROGRAM (3-YEAR AVERAGE, 1967-70)

	Comp. #3	Integ. In #2	Seg. #4	Integ. Out	Other
Compensatory (Sch. No. 3)	822	*-333*	*-347*	*-377*	*-382*
Integration-In (Sch. No. 2)		489	*- 14*	*- 44*	*- 49*
Segregation (Sch. No. 4)			475	*- 30*	*- 35*
Integration-Out (N = 8 Schools)				445	*- 5*
Other Elem. Schools (N = 34 Schools)					440

CITY SCHOOL DISTRICT
ROCHESTER, N.Y.
FEBRUARY 1971

APPENDIX D

COMPARATIVE STUDY CHART
Title I Evaluations Completed Since January 1969

STUDY	MAIN POINTS
Report of Evaluation of BIA Total ESEA Title I Programs FY 1969, Bureau of Indian Affairs, Department of Interior (October 1969)	1. A considerable amount of Title I money is not used to develop special "projects," but merely to offset the overwhelming deficiencies in BIA schools. 2. Although considerable improvement in the extent of community, parent, and student involvement in planning for Title I projects is evident, most parent advisory boards are entirely advisory in nature and have had little influence on Title I proposals. 3. Suggested that improvements in information/guidelines would improve planning and execution of projects.
Education of the Disadvantaged: An Evaluative Report of Title I, FY 1969 by Laboratory of Educational Research, University of Colorado, Boulder, Colo.	1. The greatest incidence of an academic need was for compensatory reading programs, nearly 2.5 million elementary-aged pupils in Title I schools. 2. The incidence of critical needs for compensatory educational programs proved to be correlated with pupils' ethnic group, income level of the family, urbanism of the school, whether or not the pupil's family were welfare recipients, the concentration of one ethnic group in the classroom, and the ethnic group membership of the teacher. 3. Negro pupils consistently showed a greater incidence of need for such programs than any other ethnic group.
Washington Research Project and the NAACP Legal Defense Fund, "Title I of ESEA: Is It Helping Poor Children?" Martin and McClure (December 1969)	1. Discretionary powers granted to the States ultimately affect the success of compensatory education programs. 2. Evidence within DHEW audits confirms that violations of ESEA have occurred in numerous instances. 3. An indictment is leveled at local and Federal officials who either a) misunderstand the purpose of Title I programs and funding, b) deliberately violate the legislative intent of the program, or c) by avoiding enforcement activity, condone such violations of the statute. 4. Failure of Title I rests with those who administer it, not with the program itself.

STUDY	MAIN POINTS
Urban Education Task Force, Office of Education, DHEW, *Congressional Record, 1970*	1. Confirms need for comprehensive metropolitan planning, recommending "decentralization," or the delegation of authority and responsibility to subunits under the school board, as the most effective model. 2. A major avenue toward institutional change and more responsiveness to the needs of the disadvantaged, urban child is through community involvement, the "partnership" of parents and school officials. 3. Recommends new legislation, an Urban Education Act, to define or clarify the role of States with regard to compensatory education programs instituted in their urban centers. 4. Suggests that incentive grants should be extended to the States provided they agree to match Federal funds for education.
Education for the Disadvantaged: An Evaluation Report on Title I, FY 1968, Program Planning and Evaluation, U.S. Office of Education, DHEW (April 1970)	1. No general indicator is available to illuminate the "benefit" derived from special programs, but school districts are attempting to meet the needs of pupils for supportive services, basic skills development, and cultural enrichment. 2. Special programs devoted to development of reading skills account for 47% of all Title I funding. Even though data are for FY 1968, valuable achievement information is made available here. 3. Report is based on the premise that subjective teacher expectation is an acceptable/valid instrument for measuring reading achievement.
Title I in the Great City Schools: An Analysis of Evaluation Practices and Exemplary Projects, by the Council of the Great City Schools, (April 1970)	1. Suggests more practical models for evaluation - broader range of indices of change, preparation of behavioral objectives, anticipation of other effects to be measured beyond "achievement," cost-benefit models, etc. 2. Cites "pupil mobility" as greatest single evaluation problem. 3. Suggests the following Federal administrative revisions: a) earlier allocation of funds, b) minimum of 5% funds devoted to evaluation of projects, c) more specific guidelines on project planning to assist LEA. 4. Suggests the specific training of evaluation personnel to obtain more objective, sound results.
Summary of Findings Extracted From the Preliminary Report entitled *Education of the Disadvantaged, FY 1969* by Gene Glass, BESE (July 1970)	1. Teacher expectation affected student performance and student self-expectation. 2. Economic situation of the family determines the educational opportunity of the child as well as the educational background of the head of the household.

	3. The family factor affecting educational attainment is the educational background of the head of the household. 4. The reading achievement gap between disadvantaged and nondisadvantaged students widened, in spite of compensatory reading programs, indicating that the programs did not completely meet all of their objectives.
Committee on Education and Labor Survey, House of Represenatives, *Congressional Record* (Fall 1970)	1. There are more than 16.8 million children afflicted with economic and/or educational disabilities which must be served through their school experiences. 2. The majority of these children are located in urban or rural areas, rather than in the suburbs. 3. Confirms the Congress' decision to focus attention and financial support to the public school district as the vehicle for reaching these children. 4. Findings substantiate OE conclusion that more than 80% of all Title I funds were used to meet the primary needs of the disadvantaged pupils for basic skills development and life supportive services. 5. Although programs are being targeted on the areas of greatest need, insufficient funds restrict both the scope and effectiveness of service. All eligible children are not being reached, nor is adequate assistance always available in the areas of parent participation, health, and nutrition. 6. Part II further substantiates the positive contribution being made where Title I funds are employed, but takes issue with the prescribed formula for determining eligible school districts and students, suggesting that place of residence should not be a primary determinant for approval of Title I funds.
Title I Task Force, U.S. Office of Education (March-September 1970) Preliminary Progress Report (June 8, 1970)	1. Profound impact on education opportunity for disadvantaged children has resulted principally from the increased awareness of the need for such programs generated by Title I. 2. Most criticism of Title I has come from two sources: a) complaints about questionable allocation of funds within school districts, and b) conflicting and often discouraging evaluation reports of its impact on educational achievement. 3. Indicates that solution of a) rests with tightening program administration through new guidelines, better program review, careful handling of audits, and complaint procedures. The undeveloped and complex nature of evaluation techniques, however, makes solution to b) more difficult.

STUDY	MAIN POINTS
Project SEAR, California State Department of Education's Office of Compensatory Education and the Lockheed Missiles & Space Company (August 14, 1967 - September 1970)	1. Since school staff effectiveness is the most critical measure of program success or failure, teacher training on a formalized basis, as well as improvement in all aspects of personnel management, should be mandatory. 2. There has been breakdown in school/community communication which further emphasizes the need for increased parental involvement, teacher home visitations, and more realistic program expectations. 3. The school must work more effectively as the central force in attaining community understanding, especially between the police and young people. 4. The broader range of neighborhood needs calls for more preschool, vocational and adult education, and more extracurricular activities. 5. Lack of flexibility in previous compensatory education programs indicates the need for program design improvement to accommodate different learning patterns of disadvantaged youth, to encourage achievement, and to improve the individual's self-image. 6. The paradox of the school as both the prime source of tension in the neighborhood and its greatest resource for maintaining stability.
The Belmont Project, Council of Chief State School Officers and the USOE (Spring 1969 to 1972)	1. HEW should do a thorough study of USOE data collection efforts, including the Belmont Project, to coordinate a system through which SEA's and LEA's can more effectively obtain information and to cut down friction between subdivisions of USOE itself. 2. Greater effort should be put into the Belmont Project to assure the receipt of *valid* achievement data from the schools. 3. Belmont Project should cease developing new instruments until the current ones, the Consolidated Program Information Report (CPIR) and Elementary-Pupil Centered Instrument (PGI), are operating well. 4. In addition to rotating the general manager of the Belmont Project every 2 years, alternating between a USOE official and an SEA official, HEW should contact CSSO to find out what they think of the Belmont system. 5. The purpose of the Belmont project is to establish a data base for a system of management and evaluation that will enable local and State officials to meet legally mandated program management and reporting requirements in elementary and secondary education.

State Audits, Audit Agency, DHEW (November 1970)	1. Audits were conducted in 25 States for FY 1968, in 15 States for FY 1969 covering a minimum of a 3-year period of Title I funding. 2. Ten States have *never* been audited. 3. In nearly all instances, less than 10% of the total number of the LEA's in a given State have been reviewed. 4. The incidence of violations occurred in the following order of frequency: poor SEA administration, inadequate records, questionable salaries, concentration of funds, equipment inventories, supplanting of funds, general aid, and improper inventory. 5. In four States prior unresolved violations were still in evidence when most recent audit was conducted.
An Even Chance: A Report on Federal Funds for Indian Children in Public School Districts by the NAACP Legal Defense and Educational Fund, Inc. in cooperation with the Harvard Center for Law and Education (January 1971)	1. Investigates the lack of compliance with provisions of three Federal statutes for educational aid specifically to Indian children — Impact Aid Program, Johnson-O'Malley Act and Title I of ESEA. 2. Calls for change in two abusive and illegal practices: a) the use of Title I finds as general aid (violations of guidelines on concentration, supplanting of funds, parent involvement, targeting, construction and equipment) and b) failure to comply with the statutory regulation for meeting the "special needs" of the educationally disadvantaged. 3. Places the responsibility for the failure of Title I in districts serving Indian children on all governmental agencies charged with administrating and implementing the law, but places particular blame on the State Departments of Education who have failed to review local programs. 4. The report highlights two instances in which Indians have successfully taken control of their local educational system—Rocky Boy, Mont., and Ramah, N.M.—suggesting that this type of political/educational activism will be the method chosen by Indians in the near future to improve their own schools. 5. Makes specific recommendations to State Departments of Education, U.S. Office of Education, Bureau of Indian Affairs, the Department of Agriculture and the Congress: a) for more strict enforcement of current legislation or public accountability, and b) to conduct oversight heatings to determine whether 1) legislation is being properly administered and 2) if such legislation meets the diverse needs of Indians in the public schools or if new legislation is necessary.

APPENDIX E

RECAPITULATION OF RECOMMENDATIONS OF PREVIOUS COUNCIL

The most significant recommendations of the previous National Advisory Council are listed below. They closely parallel the concerns of the present membership of the NACEDC. Action upon them is in 1971-72 even more urgently needed than it was 2 years ago. The limited extent of their application has been disappointing, but it exemplifies the throes of controversy currently engulfing, and consequently hamstringing, compensatory education.

1. The U.S. Office of Education should augment its ongoing Title I information process by engaging in a special effort to disseminate examples of demonstrably successful compensatory educational programs.

2. The Office of Education should explore both administrative and legislative means of rewarding well-designed, successful programs and providing incentives for their expansion and implementarion by other schools.

3. The Office of Education and State Departments of Education should cooperate in establishing Title I spending priorities which reflect examples of proven success or suggested failure.

4. The Office of Education and State Departments of Education should cooperate in developing criteria for more uniform, comparable evaluation data than are now submitted by local Title I programs so that more informed judgments can be made about which programs are working and which are not.

5. Professional educators and social scientists should intensify review of current achievement tests to further reduce "culture-bound" components that are biased against the disadvantaged child and conceal indications of his true, latent ability.

6. These professionals should also move beyond purely cognitive achievement tests and into other realms — self-concept, creativity, motivation, behavior — where compensatory education may have equally important long-range results.

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